

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

BIGFOOT 4x4, INC.	)	
	)	
	)	
Plaintiff,	)	
v.	)	Case No.: 1:22-cv-06758
	)	
	)	
	)	Honorable Martha M. Pacold
The Individuals, Corporations, Limited	)	
Liability Companies, Partnerships, and	)	Magistrate Judge Jeffrey T. Gilbert
Unincorporated Associations Identified on	)	
Schedule A Hereto	)	
	)	
Defendants.	)	

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**DEFENDANTS’ MOTION FOR COSTS, EXPENSES, AND FEES**

Pursuant to 28 U.S.C. § 1927 and the Court’s inherent power to issue sanctions, Defendants Shenzhen Daoen Model Technology Co., Ltd.; Shenzhen Aoxinfa Technology Co., Ltd.; and Shenzhen Tianqinli Technology Co., Ltd. (collectively, the “Daoen Defendants”) respectfully move this Court to order Bigfoot 4x4, Inc. (“Bigfoot” or “Plaintiff”) to satisfy Defendants’ costs, expenses, and fees caused by Plaintiff’s unreasonable conduct that necessitated Defendants’ preparing and filing its Motion to Compel (ECF No. 50) and Memorandum in Support (ECF No. 51). A Memorandum of Law in Support is filed concurrently with this Motion.

Date: March 1, 2023

Respectfully submitted,

*/s/ Todd R. Tucker*

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Technology Co., Ltd., and Shenzhen Tianqinli  
Technology Co., Ltd.*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 1, 2023, the foregoing was served upon counsel of record by virtue of the Court's electronic filing system.

/s/ Todd R. Tucker  
One of the attorneys for Defendants